

**McDERMOTT WILL & EMERY LLP**  
RUSSELL HAYMAN (SBN 110643)  
[rhayman@mwe.com](mailto:rhayman@mwe.com)  
2049 Century Park East, Suite 3800  
Los Angeles, California 90067-3218  
Telephone: +1 310 277 4110  
Facsimile: +1 310 277 4730

**McDERMOTT WILL & EMERY LLP**  
ANKUR GOEL (admitted pro hac vice)  
agoel@mwe.com  
JOSHUA DAVID ROGACZEWSKI (admitted pro  
hac vice)  
jrrogaczewski@mwe.com  
The McDermott Building  
500 North Capitol Street, Northwest  
Washington, D.C. 20001  
Telephone: +1 202 756 8000  
Facsimile: +1 202 785 8087

Attorneys for Defendants Aveta, Inc.; MMM Healthcare, Inc.; PMC Medicare Choice, Inc.; MSO of Puerto Rico, Inc.; MMM Holdings, Inc.; and Richard Shinto

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

UNITED STATES OF AMERICA *ex rel.* JOSÉ R. VALDEZ,

**Plaintiff.**

V.

AVETA, INC.; MMM  
HEALTHCARE, INC.; PMC  
MEDICARE CHOICE, INC.; MSO OF  
PUERTO RICO, INC.; MMM  
HOLDINGS, INC.; and RICHARD  
SHINTO

## Defendants

CASE NO. 2:11-cv-03343 GAF (JCx)

**ORDER RE MEDICAL  
RECORDS AND STIPULATION  
RE SCHEDULE FOR FILING  
REPLY BRIEF IN SUPPORT OF  
MOTION TO TRANSFER  
VENUE AND HEARING ON  
THE MOTION**

## **HEARING:**

**HEARING:**  
DATE: TBD  
TIME: 9:30 A.M.  
JUDGE: HON. GARY A. FEESS  
COURTROOM: 740

1 Having read and considered the parties' Stipulation re Medical Records and  
2 Schedule for Filing Reply Brief in Support of Motion To Transfer Venue and  
3 Hearing on the Motion, this Court hereby approves the parties' stipulation.

4 **IT IS HEREBY ORDERED THAT:**

5 (1) Relator shall produce to Defendants the full and complete medical  
6 records from (a) the facility to which Relator was discharged in July 2013 (and  
7 where he has since resided) and (b) Dr. Choi,

8 (2) the deadline for Defendants' reply brief in support of their motion to  
9 transfer (currently November 14, 2014) should be suspended and the hearing on the  
10 motion (currently December 1, 2014) should be continued, and

11 (3) the parties shall report to the Court by December 5, 2014, as to the status  
12 of the medical record production and, if appropriate, a proposed deadline for  
13 Defendants' reply.

14  
15 Dated: November 12, 2014



16  
17  
18 Hon. Gary A. Feess